

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

INTELLECTUAL VENTURES I LLC and)
INTELLECTUAL VENTURES II LLC,)
)
 Plaintiffs,) **C.A. No. 4:24-cv-00980-ALM**
)
)
 v.) **JURY TRIAL DEMANDED**
AMERICAN AIRLINES, INC.)
)
 Defendant.)

**DECLARATION OF JONATHAN WALDROP IN SUPPORT OF
PLAINTIFFS' REPLY BRIEF IN SUPPORT OF ITS MOTION TO FILE UNDER SEAL
PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz Benson Torres LLP. I am one of the attorneys responsible for the representation of Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (“Plaintiffs”) in this matter and make this declaration in support of Plaintiffs’ Reply Brief in Support of Its Motion to File Under Seal Plaintiffs’ Motion for Leave to File Amended Complaint.

2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

3. Attached hereto as Exhibit A is a true and correct copy of the Complaint for Patent Infringement (without exhibits), *Intellectual Ventures I LLC and Intellectual Ventures II LLC v. American Airlines, Inc.*, Civil Action No. 4:25-cv-00576 (E.D. Tex May 30, 2025).

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on this 17th day of June, 2025, in Redwood Shores, California.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop